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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA**

STATE OF ALASKA DEPARTMENT OF)	
NATURAL RESOURCES, et al.,)	
)	
Plaintiffs,)	
)	Case No.: 4:13-cv-00008-RRB
v.)	
)	
UNITED STATES OF AMERICA, et al.)	
)	
Defendants.)	
_____)	

JOINT MOTION TO STAY DISCOVERY

Plaintiffs State of Alaska Department of Natural Resources and Department of Transportation and Public Facilities (“the State”) and Defendant the United States respectfully request the Court stay discovery in this matter under its “discretionary

power” to stay proceedings. *Lockyer v. Mirant Corp.*, 398 F.3d 1098, 1109 (9th Cir. 2005).

The State and the United States (collectively, the “Parties”) are engaging in settlement discussions to determine whether they can resolve this case without the need for protracted litigation. The Parties have made substantial progress on the terms of a possible settlement, but require additional time to finalize the terms of a recommended settlement as well as negotiate the language of a draft settlement agreement. Once counsel for the Parties have agreed upon the language of the recommended settlement agreement, the agreement must be reviewed and considered by the appropriate officials within the United States Department of Interior, the United States Department of Justice, and the Alaska Department of Law. If those officials authorize the proposed settlement and approve of the anticipated settlement agreement, the settlement can be executed and finalized.

Based on the foregoing, the Parties need additional time to negotiate language and to seek the required approvals. Accordingly, the Parties respectfully request that the Court issue a stay of discovery (including all current litigation deadlines). The Parties propose to file a Joint Status Report by November 17, 2021 (120 days from the filing of this Joint Motion), to inform the Court of the status of settlement and to propose any future actions in this case as may be appropriate, including dismissal of this action. The Parties submit that this request will not prejudice any party and will help foster judicial

economy in the event that the Parties are successful in resolving the case through settlement.

Respectfully submitted this 20th day of July 2021.

TREG R. TAYLOR
Attorney General
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/s/ Jessica M. Alloway (with permission)

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